

**Law Office of  
David Wims**

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May 23, 2025

**BY ECF**

U.S. District Court – E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Attn: Honorable Magistrate Judge Cheryl L. Pollak

**Re: *Ugwudiobi et al v. International Trendz, LLC d/b/a Presidential Security Co. et ano (22CV4930) (RER) (CLP) and Odom et al v. International Trendz, LLC et ano (23CV828) (RER) (CLP)***

Dear Judge Pollak:

Please be advised that I am the attorney for the *Ugwudiobi* Plaintiffs in the above referenced consolidated proceeding. I write with the knowledge and consent of the *Odom* Plaintiffs, and on notice to Defendants, to raise a discovery dispute with the Court pursuant to Your Individual Practices.

In June 2024, Plaintiffs deposed Defendants, by and through Defendant Ismail Qadar. At that deposition, Defendant Qadar testified to the existence of the corporate and individual Defendants' tax records, bank records and payroll records for the years 2020-2024. Plaintiffs requested copies thereof on the record. To date, despite numerous requests, and responses that the same were forthcoming, Plaintiffs have not received the same. (Attached as Exhibit 1). In addition, Defendant has raised no timely (or other) objections to the aforementioned requests. Prior to this application, Plaintiffs attempted repeatedly to obtain the subject records without court intervention.

Law Office of David Wims

5/23/2025

Based on the foregoing, Plaintiffs ask the Court to compel Defendants' production of:

1. Defendant Qadar's and International Trendz, LLC's 2020-2023 federal and state tax returns;
2. Defendant Qadar's and International Trendz, LLC's 2020-2024 monthly bank statements, including but not limited to at Santander Bank and JPMorgan Chase Bank; and
3. Executed authorization from Defendant International Trendz, LLC to obtain all payroll records from its former payroll provider - Gusto.

Thank You for Your time and consideration. Kindly direct any questions to the undersigned.

Respectfully yours,

/s/

David C. Wims, Esq. (DW-6964)

cc: Honorable Ramon E. Reyes (By ECF)  
Ian Smith, Esq. (By ECF)  
Erik Bashian, Esq. (By ECF)  
Russell Moriarty, Esq. (By ECF)  
Jason Mizrahi, Esq. (By ECF)  
Joshua Levin-Epstein, Esq. (By ECF)

**EXHIBIT 1**

**EXHIBIT 1**

Subject **Re: EXT: RE: Ugwudiobi et al v. International Trendz, LLC et al and ODOM, Deposition of International Trendz**

From David C. Wims, Esq. <dwims@wimslaw.com>

To Ian Smith <ian@spirelawfirm.com>

Cc Erik Bashian <eb@bashpaplaw.com>, Justin Clark <jclark@levineblit.com>, Whitney DuPree <whitney@spirelawfirm.com>, Sarah Hander <sarah@spirelawfirm.com>

Date 2024-07-04 11:55



Ian,

Hope all is well. Please consider this a formal request for the production of the following documents based on Mr. Qadar's deposition:

- 1. Defendant Qadar's and International Trendz, LLC's 2020-2023 federal and state tax returns;**
- 2. Defendant Qadar's and International Trendz, LLC's 2020-2024 monthly bank statements, including but not limited to at Santander Bank and JPMorgan Chase Bank; and**
- 3. Executed authorization from Defendant International Trendz, LLC to obtain all payroll records from its former payroll provider - Gusto.**

Thanks.

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On 2024-07-01 12:25, David C. Wims, Esq. wrote:

Confirmed.

David C. Wims, Esq.  
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From David C. Wims, Esq. <dwims@wimslaw.com>

To Ian Smith <ian@spirelawfirm.com>

Cc Erik M. Bashian (Other) <eb@bashpaplaw.com>, Justin Clark <jclark@levineblit.com>, Sarah Hander <sarah@spirelawfirm.com>

Date 2024-09-09 11:38



Ian,

Hope all is well. Please advise as to your clients' production of the requested tax and bank records. Thanks.

David C. Wims, Esq.  
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On 2024-07-17 13:22, David C. Wims, Esq. wrote:

When do you want to depose Mr. Ugwudiobi Ian?

David C. Wims, Esq.  
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On 2024-07-12 17:27, Ian Smith wrote:

Counsel,

International Trendz is working on the additional documents. I regret I don't have an ETA just yet.

Subject **Re: EXT: RE: Ugwudiobi et al v. International Trendz, LLC et al and ODOM, Deposition of International Trendz**

From David C. Wims, Esq. <dwims@wimslaw.com>

To Ian Smith <ian@spirelawfirm.com>

Cc Erik M. Bashian (Other) <eb@bashpaplaw.com>, Justin Clark <jclark@levineblitt.com>, Sarah Hander <sarah@spirelawfirm.com>

Date 2024-10-11 09:15



Ian,

Hope all is well. Two (2) things: 1 - will you consent to my application to extend the time to submit to the Court revised, proposed CC motion Notice and Consent forms? We need an additional 21 days to consult with new co-counsel as a result of Mr. Clark's departure from his former firm, Levine & Blitt; and

2 - please advise as to when we can expect the bank and tax records we requested at and following Mr. Qadir's deposition. We wish to avoid unnecessary motion practice on this issue. Thanks.

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On 2024-07-12 17:27, Ian Smith wrote:

Subject **Re: EXT: Re: 1:22-cv-04930-RER-CLP Ugwudiobi et al v. International Trendz, LLC et al**  
From David C. Wims, Esq. <dwims@wimslaw.com>  
To Ian Smith <ian@spirelawfirm.com>  
Cc Erik Bashian <eb@bashpaplaw.com>, Russell Moriarty <rmoriarty@levineblit.com>, Sarah Hander <sarah@spirelawfirm.com>  
Date 2025-03-17 12:28



Ian,

Hope all is well. We are still awaiting the additional discovery we requested at Mr. Qadir's deposition - company and personal (Qadir) tax returns since 2018; and company and personal (Qadir) bank statements since 2018. Although you previously indicated the foregoing were forthcoming, we have not received yet. Please advise. Thanks.

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On 2025-03-14 15:06, David C. Wims, Esq. wrote:

Ian,

Please just replace "discovery" with "all" in the 2nd to last sentence.

David C. Wims, Esq.  
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On 2025-03-14 15:00, Ian Smith wrote:

David,

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From David C. Wims, Esq. <dwims@wimslaw.com>

To Ian Smith <ian@spirelawfirm.com>

Cc Erik Bashian <eb@bashpaplaw.com>, Russell Moriarty <rmoriarty@levineblit.com>, Sarah Hander <sarah@spirelawfirm.com>

Date 2025-05-15 12:47



Ian,

Hope all is well. We need the Defendants' bank records and tax records asap. We've requested them multiple times, on the record at your client's deposition and in writing. If we do not have them by Wednesday May 21, 2025, we are moving to compel. Thanks.

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On 2025-05-02 18:05, David C. Wims, Esq. wrote:

Thanks.

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On 2025-05-02 17:41, Ian Smith wrote:

Please proceed with Defendants' consent.

Ian



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From Ian Smith <ian@spirelawfirm.com>

To David C. Wims, Esq. <dwims@wimslaw.com>

Cc Erik Bashian <eb@bashpaplaw.com>, Russell Moriarty <rmoriarty@levineblit.com>, Sarah Hander <sarah@spirelawfirm.com>

Date 2025-05-15 13:57



David,

I will reach out to International Trendz today.

Ian

Ian E. Smith, Esq. | Partner

[ian@spirelawfirm.com](mailto:ian@spirelawfirm.com) | 212.335.0018  
[www.spirelawfirm.com](http://www.spirelawfirm.com)  
Offices in Atlanta and New York

-----Original Message-----

From: David C. Wims, Esq. <[dwims@wimslaw.com](mailto:dwims@wimslaw.com)>  
Sent: Thursday, May 15, 2025 12:48 PM  
To: Ian Smith <[ian@spirelawfirm.com](mailto:ian@spirelawfirm.com)>  
Cc: Erik Bashian <[eb@bashpaplaw.com](mailto:eb@bashpaplaw.com)>; Russell Moriarty <[rmoriarty@levineblit.com](mailto:rmoriarty@levineblit.com)>; Sarah Hander <[sarah@spirelawfirm.com](mailto:sarah@spirelawfirm.com)>  
Subject: Re: EXT: Re: 1:22-cv-04930-RER-CLP Ugwudiobi et al v. International Trendz, LLC et al

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